

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
GOVERNMENT OF THE UNITED	:	1:22-cv-10904 JSR
STATES VIRGIN ISLANDS,	:	
Plaintiff,	:	
	:	<b>NOTICE OF MOTION</b>
-against-	:	
	:	
JP MORGAN CHASE BANK, N.A.,	:	
	:	
Defendant.	:	
-----	X	

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Jordan Merson and Memorandum of Law, both dated April 29, 2024, Proposed Intervenors, by and through their undersigned counsel, shall move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order granting them access to the unredacted filings in this action to the parties and their counsel in accordance with the same Protective Order entered in this action, together with such other and further relief as this Court deems just and proper.

Dated: April 29, 2024  
New York, New York

Respectfully submitted,

**MERSON LAW PLLC**

By: /s/ Jordan Merson

Jordan Merson, Esq.  
950 Third Avenue, 18<sup>th</sup> Floor  
New York, NY 10022  
Telephone: (212) 603-9100  
Fax: (347)- 441-4171  
[JMerson@MersonLaw.Com](mailto:JMerson@MersonLaw.Com)  
*Counsel for Proposed Intervenors*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
GOVERNMENT OF THE UNITED	:	
STATES VIRGIN ISLANDS,	:	
Plaintiff,	:	1:22-cv-10904 JSR
	:	
-against-	:	
	:	
JP MORGAN CHASE BANK, N.A.,	:	
	:	
Defendant.	:	
	:	
x-----		

**DECLARATION OF JORDAN MERSON IN SUPPORT OF PROPOSED  
INTERVENORS' MOTION**

1. I, Jordan Merson, Esq., hereby declare as follows:

2. I am a member of the law firm Merson Law, PLLC and counsel for Proposed Intervenor in this action. Proposed Intervenor is the Plaintiff in the action, *Doe v. USVI, et al.*, 23-cv-10301 (AS), presently pending in this Court.

3. I make this Declaration in support of Proposed Intervenor's motion for an Order granting them access to the unredacted filings and access to certain complete deposition transcripts related to USVI defendants in this action to the parties and their counsel in accordance with the same Protective Order entered in this action. If this application is granted, said Protective Order will be circulated to counsel for the parties in the *Doe v. USVI, et al.*, 23-cv-10301 (AS) action.

4. In support thereof, I annex:

Exhibit A - a Proposed Confidentiality Order; and

Exhibit B - this Court's Order in *Doe I v. JP Morgan Chase & Co.*, 22-cv-10019-JSR, Document 5.

Dated: April 29, 2024  
New York, New York

Respectfully submitted,

**MERSON LAW, PLLC**

By: /s/ Jordan Merson  
Jordan Merson  
950 Third Avenue, 18<sup>th</sup> floor  
New York, NY 10022  
Telephone: (212) 603-9100  
Fax: (347)- 441-4171  
JMerson@MersonLaw.Com  
Counsel for Plaintiff